

## **EXHIBIT B**

**David Shufrin**

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**From:** David Shufrin  
**Sent:** Friday, February 05, 2016 10:13 AM  
**To:** Paula Colbath  
**Cc:** 'Alex Young'; Leily Lashkari; David Slossberg; 'Cody Guarnieri'; Richard Brown (rbrown@bpslawyers.com)  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter  
**Attachments:** 2-5-16 Ltr to Colbath re Deposition of Dan Carpenter.pdf  
**Importance:** High

Paula,

Please find attached correspondence regarding your efforts to depose Mr. Carpenter. As stated therein, we'd appreciate a response from your office by the close of business today.

Sincerely,



David C. Shufrin, Esq.  
HURWITZ SAGARIN SLOSSBERG & KNUFF, LLC  
147 North Broad Street  
Milford, CT 06460  
Tel: 203-877-8000 Fax: 203-878-9800  
DShufrin@hssklaw.com www.hssklaw.com

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**From:** Alex Young [mailto:[ayoung@loeb.com](mailto:ayoung@loeb.com)]  
**Sent:** Thursday, February 04, 2016 5:55 PM  
**To:** David Shufrin  
**Cc:** David Slossberg; Paula Colbath; Leily Lashkari  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

David,

I just left a message on your machine regarding Daniel Carpenter's deposition on Feb. 10 at the Donald W. Wyatt Detention Facility. Mrs. Singleton has informed me that you have not contacted her or provided her with a list of attendees (and again, for non-attorneys, the attendee's name, DOB, and SS number). If you or anyone at your firm intends to represent Mr. Carpenter at the deposition, she needs this information by end of business tomorrow.

As I have mentioned before, Mrs. Singleton can be reached at [JSingleton@wyattdetention.com](mailto:JSingleton@wyattdetention.com).

Thanks,

Alex Young

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**From:** Alex Young  
**Sent:** Wednesday, February 03, 2016 4:43 PM  
**To:** 'David Shufrin'  
**Cc:** 'David Slossberg'; Paula Colbath; Leily Lashkari  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

David,

I just wanted to touch base to see if you've reached out to Mrs. Singleton at the Donald W. Wyatt Detention Facility and provided her with a list of your attendees for the Feb. 10 deposition of Daniel Carpenter yet. If you have not already done so, please contact her as soon as possible.

Additionally, the subpoena to Daniel Carpenter for testimony at a deposition has been served. I believe I sent you a copy of it last week, but please find another copy attached.

Thanks,

Alex

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**From:** Alex Young  
**Sent:** Tuesday, February 02, 2016 11:54 AM  
**To:** 'David Shufrin'  
**Cc:** David Slossberg; Paula Colbath; Leily Lashkari  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

David,

Thank you for your response. My contact at the facility has been Jean Singleton, who can be reached at [JSingleton@wyattdetention.com](mailto:JSingleton@wyattdetention.com). Please tell her in your communications that it is in reference to the deposition of Daniel Carpenter (#90792-038) on Feb. 10. Also, if you intend to represent Mr. Carpenter at the deposition, please provide the facility with a list of individuals who will be attending, and for non-attorneys, the individual's SS number and DOB, as soon as possible.

Thanks,

Alex Young

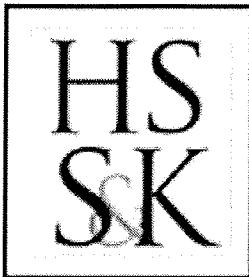
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**From:** David Shufrin [mailto:[DShufrin@hssklaw.com](mailto:DShufrin@hssklaw.com)]  
**Sent:** Monday, February 01, 2016 5:42 PM  
**To:** Alex Young  
**Cc:** David Slossberg  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

Alex,

Thank you for your email. Our office does represent Mr. Carpenter in connection with the Penn Mutual v. Universitas et al. matter. We are not, however, authorized to accept service on Mr. Carpenter's behalf. Please keep us informed as to any arrangements you are making with respect to this deposition and provide us with a copy of any subpoena that is actually served on Mr. Carpenter. Please also provide us with the contact information for the individual you are working with at the Donald W. Wyatt Detention Facility. To the extent the facility will require personally identifiable information from us, we'd prefer to provide that directly.

Thank you,



David C. Shufrin, Esq.  
**HURWITZ SAGARIN SLOSSBERG & KNUFF, LLC**  
147 North Broad Street  
Milford, CT 06460  
Tel: 203-877-8000 Fax: 203-878-9800  
[DShufrin@hssklaw.com](mailto:DShufrin@hssklaw.com) [www.hssklaw.com](http://www.hssklaw.com)

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**From:** Alex Young [mailto:[ayoung@loeb.com](mailto:ayoung@loeb.com)]  
**Sent:** Friday, January 29, 2016 2:22 PM  
**To:** 'dslossberg@hssklaw.com'  
**Cc:** Paula Colbath; Leily Lashkari; Richard Brown; Cody Guarnieri; 'LaBelle, Dan E.'; Timothy Cummins  
**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

Dear Mr. Slossberg,

I write to inform you that we are working with the Donald W. Wyatt Detention Facility (950 High Street, Central Falls, RI 02863) to schedule the deposition for Daniel Carpenter for Feb. 10. Please find attached the court order authorizing Mr. Carpenter's deposition and a subpoena to Mr. Carpenter. The Detention Facility needs to know the names, DOBs, and SS numbers of everyone who intends to be present at the deposition, and will require background checks (maybe a form) for non-attorneys.

As you can see below, we have been informed that your firm is representing Mr. Carpenter. Please advise as to whether that is correct and you intend to represent Mr. Carpenter at the deposition, and if so, a list of names/DOB/SS numbers of those who will be attending with you. Please also advise as to whether you will accept service of the attached subpoena on your client's behalf.

Thank you for your attention to this matter. Have a good weekend,

Alex Young

**Alex Young**  
*Not Admitted*



345 Park Avenue | New York, NY 10154

Direct Dial: 212.407.4118 | Fax: 646.924.3312 | E-mail: [ayoung@loeb.com](mailto:ayoung@loeb.com)

Los Angeles | New York | Chicago | Nashville | Washington, DC | Beijing | Hong Kong | [www.loeb.com](http://www.loeb.com)

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**From:** Cody Guarneri [<mailto:cguarnieri@bpslawyers.com>]

**Sent:** Thursday, January 28, 2016 5:33 PM

**To:** Alex Young

**Cc:** Paula Colbath; Richard Brown

**Subject:** RE: Penn Mutual v. Universitas and the Grist Mill Employee Welfare Benefit Plan and Trust - Deposition of Daniel Carpenter

Mr. Young,

I am responding to your recent email to Attorney Brown regarding a deposition of Mr. Daniel Carpenter. We appreciate the courtesy of keeping us informed of your intention to depose Mr. Carpenter. We understand that Mr. Carpenter is represented by Hurwitz, Sagarin, Slossberg & Knuff, LLC, with regard to civil litigation in the Southern District of New York. We would ask that any efforts to depose Mr. Carpenter be coordinated with their office.

Thank you,

**CODY N. GUARNIERI**

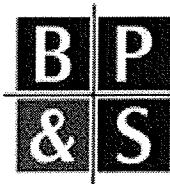
[cguarnieri@bpslawyers.com](mailto:cguarnieri@bpslawyers.com)

100 Pearl Street, Hartford, CT 06103

Phone (860) 522-3343

Fax (860) 522-2490

[www.bpslawyers.com](http://www.bpslawyers.com)



**Brown Paindiris & Scott, LLP**

Attorneys At Law

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